

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-327-C**

IN RE:

Continued Availability of Unbundled High)
Capacity Loops at Certain Locations and)
Unbundled High Capacity Transport on Certain)
Routes Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR ADMISSIONS, INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

WITH PUBLIC REDACTED ATTACHMENT

AT&T Communications of the Southern States, LLC, (hereinafter, "AT&T"), pursuant to Orders entered in this Docket by the Public Service Commission of South Carolina (hereinafter, "Commission"), Order 2003-729, Granting Motion for Protective Order & Protective Order, entered on December 17, 2003; Order 2003-730, Granting Motion for Initial Procedural Order, entered on December 17, 2003; Rules 26, 33 and 34 of the South Carolina Rules of Civil Procedure, and Rules 103-853 and 103-854 of the Rules and Regulations of the Commission, hereby submits the following Responses to BellSouth Telecommunications, Inc.'s (hereinafter, "BellSouth") Request for Admissions, Interrogatories and Requests for Production of Documents to AT&T. Should additional responsive information be discovered at any time prior to hearing, AT&T reserves the right to supplement, revise, and/or modify these Responses.

SPECIFIC RESPONSES

Number 1 Please admit that AT&T has deployed high capacity transport facilities to each of the central offices (identified by CLLI codes) listed below:

SC	AT&T	CHTNSCDT
SC	AT&T	GNVLSCDT

Response: AT&T denies that it has deployed, to any of the central offices listed in the Confidential Attachment, any facilities that meet the FCC's definition of dedicated transport as contained and explained within the TRO (facilities that provide a dedicated route between two ILEC central offices). Additionally AT&T denies that it has any presence in certain of the central offices listed in the Confidential Attachment.

The attached confidential document contains specific responses for each of the central offices in all BellSouth States for which this information has been requested.

Number 2: Please admit that AT&T can route or transport traffic using AT&T's own facilities between any pair of central offices to which it has deployed high capacity transport facilities. This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as AT&T's switch or the switch of another CLEC.

Response: Denied.

The "transport" at issue in this proceeding is "dedicated transport," which the FCC defines as being "dedicated to a particular customer or carrier." It is not possible to provide transport dedicated to a particular customer or carrier through a switch. Switches are designed, and function, to connect different customers to each other on an as needed basis.

SBC agrees that dedicated transport does not include switching. In testimony filed before the California Public Utilities Commission on November 20, 2003, Mr. Scott J. Alexander, of SBC, provided the following definition of dedicated transport:

Dedicated transport facilities connect two points within a communications network, so that information can be transmitted between those two points.

"Dedicated" transport means all or part of the facility is dedicated to a particular carrier or use and that there

is no switching interposed along the transport route.

(Emphasis added – testimony in dockets R. 95-04-043 and I. 95-04-044, November 20, 2003)

AT&T does not have its own facilities “between any pair of central offices” in any portion of BellSouth’s nine state territory on either a direct or indirect (through some other central office) basis.

AT&T typically connects its on-net collocations, that is, collocations to which it has constructed fiber facilities to its network (i.e., an entrance facility), using two-point rings, where one point is the collocation and the second is the AT&T network location (e.g., an AT&T switching center or point of presence). Accordingly, it is not possible to provide “dedicated transport” because, even though more than one collocation is on the same cable route, the collocations are not on the same fibers.

AT&T ring construction practices do not provide for multiple incumbent wire centers on the same ring. In the rare instances that multiple incumbent wire centers exist on the same ring, this condition is likely to be the result of (1) acquiring the fiber network of a company that deployed such configurations or (2) sales force error (e.g., sales personnel making commitments based on an erroneous belief that a building was on AT&T’s network when it was not). In any event, the presence of multiple incumbent wire centers on the same ring/transmission system is a rare operational exception to AT&T’s network engineering practices.

Even though technology may permit a carrier to create a dedicated transport path between two points, the cost of doing so can be substantial, particularly given that the demand between the two endpoints in the incumbent’s network will likely be very small. Accordingly, the FCC’s trigger analysis properly requires that a “trigger firm” actually be providing service between the identified offices that form a dedicated transport route. As with all facilities construction, a carrier cannot reasonably be expected to incur the costs of providing connections unless it is a rational approach to the serving arrangement and has the prospect to generate revenues sufficient to cover the costs incurred. AT&T has found that demand for capacity between two ILEC wire locations on its own ring is too small to justify such an approach.

Number 3: Please admit that AT&T has fiber based collocation arrangements at the central offices (identified by CLLI code) listed below:

SC	AT&T	CHTNSCDT
SC	AT&T	GNVLSCDT

Response: The document attached in Response to Number 1 contains specific responses for each of the central offices in all BellSouth States for which this information has been requested.

Number 4: If AT&T has denied any of the previous Requests for Admissions, state all facts and identify all documents that support such denial.

Response: See AT&T's previously submitted discovery responses.

As used in the attachment, the term "Deny (LD)" is associated with an AT&T network location on AT&T's Long Distance Network rather than AT&T's Local Network.

As used in the attachment, the term "Admit (M1) and Deny (AT&T)" means that the fiber entering that location is owned and used exclusively by Comcast (formerly Media One). AT&T's Local Network collocation at that location is not fiber based.

As used in the attachment, the term "No presence" means that according to its records AT&T does not have an active collocation at the location.

Number 5: If AT&T has admitted any portion of Request for Admission 4, please describe with particularity the nodes or termination points along the route.

Response: Not applicable.

Number 6: If AT&T has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where AT&T installed its own inside wiring, the percentage of buildings where AT&T is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where AT&T is using inside wiring owned by the building owner. In each of these

situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings.

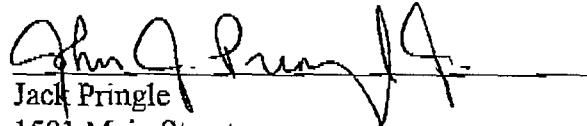
Response: Inside wiring is the customer's responsibility. AT&T stops at the network interface device on the customer premises.

RESPONSE TO REQUESTS FOR PRODUCTION

Number 7: Produce any documents identified above.

Response: AT&T has provided one document as an attachment to the foregoing Interrogatory responses. No other documents were identified.

Respectfully submitted this 1st day of March, 2004.



Jack Pringle
1501 Main Street
5th Floor
Columbia, SC 29201
(803) 779-0066 (Telephone)

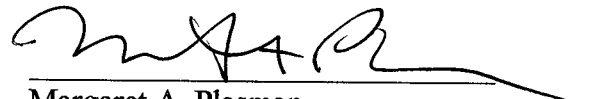
Gene Coker
1200 Peachtree Street, NE
Suite 8018
Atlanta, GA 30309
(404) 810-8700 (Telephone)

Attorneys for AT&T Communications
of the Southern States, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Responses to Bellsouth Telecommunications, Inc.'s Request for Admissions, Interrogatories and Requests for Production of Documents filed on behalf of AT&T Communications of the Southern States, LLC, was electronically served upon all parties of record and a copy of the confidential attachment was delivered by overnight mail to those parties eligible to receive it.

This, the 1st day of March, 2004.


Margaret A. Plasman

AT&T's Response to BellSouth's Request for Admissions,
Interrogatories and Requests for Production of Documents
All BellSouth States
REDACTED ATTACHMENT

State	High Capacity-Transport	Fiber Based Collocation
Alabama		
	No presence	No presence
	Deny	Admit
	Deny	Deny
	Deny	Deny
	Deny	Deny (LD)
	Deny	Deny (LD)
Florida		
	Deny	Admit
	Deny	Admit
	No presence	No presence
	Deny	Deny
	Deny	Deny (LD)
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Deny (LD)
	No presence	No presence
	Deny	Admit
	Deny	Deny
	Deny	Deny
	Deny	Admit
	Deny	Deny
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Admit
	Deny	Deny
	Deny	Deny
	No presence	No presence
	Deny	Deny
	Deny	Admit
	Deny	Admit
	Deny	Deny
	Deny	Admit
	Deny	Admit
	No presence	No presence
	Deny	Deny (LD)
	No presence	No presence
	Deny	Deny
	Deny	Admit
	No presence	No presence
	Deny	Admit

Redacted

AT&T's Response to BellSouth's Request for Admissions,
Interrogatories and Requests for Production of Documents
All BellSouth States
REDACTED ATTACHMENT

No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence
No presence	No presence

Georgia

Deny	Deny (LD)
Deny	Deny (LD)
Deny	Admit
Deny	Admit
Deny	Admit
Deny	Admit
Deny	Admit
Deny	Admit (M1) and Deny (AT&T)
Deny	Admit
Deny	Deny
Deny	Deny (LD)
Deny	Deny
Deny	Deny
Deny	Admit
Deny	Admit (M1) and Deny (AT&T)
Deny	Deny
Deny	Deny (LD)
Deny	Admit
Deny	Admit
Deny	Admit (M1) and Deny (AT&T)
Deny	Admit
Deny	Admit
Deny	Deny (LD)
Deny	Admit

Kentucky

No presence	No presence
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Louisiana

Deny	Deny (LD)
Deny	Deny (LD)
Deny	Deny (LD)

Mississippi

Deny	Deny (LD)
Deny	Deny (LD)

N. Carolina

Deny	Deny (LD)
Deny	Admit
Deny	Admit
Deny	Admit

Redacted

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Interrogatories and Requests for Production of Documents
All BellSouth States
REDACTED ATTACHMENT

Deny	Admit
Deny	Admit
Deny	Admit
Deny	Deny
Deny	Admit
Deny	Admit
Deny	Deny
Deny	Admit
Deny	Admit
Deny	Admit
Deny	Admit

S. Carolina

Deny	Deny (LD)
Deny	Deny (LD)

Tennessee

Deny	Deny
Deny	Admit
Deny	Admit
Deny	Deny
Deny	Admit
Deny	Deny
Deny	Deny (LD)
No presence	No presence
No presence	No presence
Deny	Deny
Deny	Deny
No presence	No presence
Deny	Admit
Deny	Admit
Deny	Admit

Redacted